

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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AHMAD FARID KHORRAMI,

Plaintiff,

v.

DALE MUELLER,

Defendant.

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Civil Action No.: 2:07-CV-00812

**PROTECTIVE ORDER**

1. As used in this Order, “Confidential Materials” refers to any materials and data from Plaintiff’s MMPI-2, PAI, and Rorschach testing.

2. Documents produced by Defendant that contain Confidential Material shall be marked “Produced Subject to Protective Order.” Any portion of a deposition transcript that contains, discusses, or refers to Confidential Materials shall also be subject to this Order, regardless of whether it is so marked.

3. Confidential Materials shall be used by the parties to this lawsuit and their representatives only for purposes of litigating this case, including any settlement negotiations and appeals, and shall not be disclosed to the public or any other person or entity for any other reason.

4. Except as otherwise ordered by this Court, Confidential Materials may be disclosed only to the following persons: (a) parties and attorneys for the parties in this action; (b) persons regularly in the employ of such attorneys to the extent reasonably necessary to render professional services in this action; (c) law student interns working under the supervision of any

party's attorney; (d) any experts engaged by the parties, provided that such disclosure is reasonably and in good faith calculated to aid in litigating this action; (e) any deponent in this action during his or her deposition; and (i) court reporters for the purposes of depositions.

5. Any person to whom Confidential Materials are disclosed is subject to this Order and must read the Order and acknowledge its applicability before receiving Confidential Materials.

6. Unless Confidential Materials are fully redacted from documents, briefs, or other materials presented to the Court, and cannot be determined from context, those portions of the documents, briefs, or other materials containing the Confidential Materials shall be filed under seal. These Confidential Materials shall remain under seal at the conclusion of the litigation.

7. Should either party use Confidential Materials in open Court, any exhibits and portions of the transcript containing Confidential Materials shall be kept under seal and remain so at the conclusion of the litigation.

Dated at Milwaukee, Wisconsin, this 3rd day of November, 2011.

**BY THE COURT:**

A handwritten signature in black ink, appearing to read "Rudolph T. Randa", written over a horizontal line.

**HON. RUDOLPH T. RANDA**  
**U.S. District Judge**